REMARKS

The application contains 30 claims. Claims 1, 11 and 21 are independent. No amendments have been made.

Claims 1-2, 5-77, 11-12, 17, 21-22, 25 and 27 stand rejected under 35 U.S.C. §102(e) as being anticipated by Alderson (US 6,973,218); claims 9-10, 19-20 and 29-30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Anderson in view of Applicant's admitted prior art. Claims 3, 4, 6, 8, 13, 14, 16, 18, 23, 24, 26 and 28 are objected to as being dependent on a rejected base claims.

With respect to the anticipation of independent claims 1, 11 and 21 under 35 U.S.C. §102(e) by Alderson, applicants submit that there is a fundamental difference between the present invention and Alderson concerning the methodology, and therefore the independent claims are not *prima facie* anticipated by the Alderson reference, as discussed below.

In response to the previous rejection over Tasli, Applicants amended claim 1 to make explicit that the gradient image is a vector image and not a scalar image as was the field in Tasli.

In the new rejection, the Examiner alleges that Alderson teaches a vector gradient and points to col. 7, lines 26-29 as teaching that a gradient image is generated. Applicants respectfully submit that Alderson no more teaches a vector gradient images than does Tisli.

In fact, these lines (and the preceding text, lines 8-25) merely explain what is meant by the term "low frequency gradients". There is no teaching that the gradients that are derived are vector gradients.

Furthermore, looking at the diagram 700 in Fig. 7, it will be clear to a person of skill in the art of image processing that the steps (702 - downsample, 706/708 - median filtering, 710 – mean filtering, 712 - upsample, 714 - smooth) neither construct a gradient field nor manipulate such a field directly. As for step 716 (remove low frequency gradient data) it is clearly stated in the text of the patent that this simply refers to the subtraction of the (possibly scaled) median and mean filtered image after u-sampling it back to the original resolution (column 15, lines 26-41). The text refers to the output of the previous steps as "low-frequency gradient data", but their terminology is unfortunately not correct. The data they speak of could have been described more accurately as the "low-frequency component of the image", because

all they do to obtain it amounts to low-pass filtering and it does not have the vector nature of a gradient, at least as claimed.

In summary, what Alderson refers to as "gradient data" and what we refer to as the "gradient image" or" gradient field" are two entirely different things (and our usage of the term accurate, while theirs is not).

Applicants appreciate that the Examiner has found a number of the dependent claims to be patentable. However, in view of the clear patentability of the independent claims, applicants are not amending the claims at this time.

An allowance of the claims is respectfully awaited. In the event that the Examiner believes that there are problems which would make it impossible to issue an allowance for all the claims, the Examiner is respectfully requested to call the undersigned at 1 (877) 428-5468, which is a US toll free number connected directly to our office in Israel (please note the 7 hour time difference and the official work week is from Sunday to Thursday).

Applicants respectfully request an oral interview with the Examiner and the Examiner's supervisor, in the event that the Examiner is unwilling to allow the application, based on the above arguments he is respectfully requested to call the undersigned to arrange for a telephonic interview.

Respectfully submitted,
Raanan FATTAL, et al.

Paul Fenster

Paul Fenster
Reg. No. 33,877

Encl.:
Petition for Extension (2 months)